

## PATENT

## C. REMARKS

Claims 1-25 are pending in the present application. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 102, Anticipation

The Examiner rejected claims 1, 3-8, 10-15, 17-21, and 25 under 35 U.S.C. § 102 as being anticipated by US 6,311,321 (AGNIHOTRI et al.) 2001-10-30. This rejection is respectfully traversed.

With respect to claim 1, the rejection of which is representative of that of the other claims, the Examiner stated:

Agnihotri discloses receiving one or more console identifiers, each of the console identifiers corresponding to one of the management consoles (col. 5, lines 3-7 'provides the user the option to select one console'); retrieving one or more plug-in code files, each of the plug-in code files derived from the management data (col. 4, lines 50-55 'applet components') and each adapted to interface with one of the management consoles (col. 4, lines 50-55 'specific to the Enterprise management console'); retrieving on or more display panel files derived from the management data (col. 4, lines 58-63 'Install interface'); and writing the plug-in code files and the display panels to a distribution medium (col. 4, lines 32-35 'a software module provided on a tangible medium').

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). AGNIHOTRI fails to anticipate the presently claimed invention because it fails to show all of the elements of the claimed invention.

The rejected independent claims, 1, 8, 15, and 25, all recite "plug-in code files *derived from the management data*" and "display panel files *derived from the management data*" (emphasis added). These features are not taught or suggested by AGNIHOTRI. While the Examiner has cited various excerpts from AGNIHOTRI that the Examiner argues teach these claim elements, AGNIHOTRI fails to teach or otherwise describe or suggest the origin of the "applet components" and "install interface" the Examiner refers to.

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For instance, the Examiner cites to col. 4, lines 50-55 of AGNIHOTRI as teaching the claimed "plug-in code files" by describing "applet components." This excerpt is reproduced below:

The Install module 210 may be used to provide a file-based interface to applets for installing applet components, such as the applet.exe and dynamics link libraries (DLLs), and components specific to the Enterprise management console such as class object definitions (in the case of CA Unicenter console). [col. 4, lines 50-55].

While Applicants fundamentally disagree with the Examiner's equating "applet components" to the claimed "plug-in code files," even if one assumes, for the sake of argument, that the claimed "plug-in code files" and AGNIHOTRI's "applet components" could be equated in this fashion, AGNIHOTRI would still fail to teach or suggest the present invention as claimed, since AGNIHOTRI fails to teach or suggest that the plug-in code files are *derived from management data*, as recited in independent claims 1, 8, 15, and 25. In fact, AGNIHOTRI fails to provide any indication as to the origin of its "applet components" at all.

Likewise, col. 4, lines 58-63 of AGNIHOTRI fails to teach or suggest display panel files *derived from management data*:

As shown in FIG. 3, the Install module 210 comprises an Install framework 212, and install interface DLL 214, and a plurality of comprehensive generic interface for installation of applets into existing Enterprise management consoles such as HP OpenView, CA Unicenter and other MConsoles via corresponding HP OpenView Libraries 302, and CA Unicenter Libraries 312 and other MConsole #N Interface Libraries 322. [col. 4, lines 58-67].

The present invention, on the other hand, is specifically directed to the derivation of plug-in code and display panels from management data. In a preferred embodiment, these plug-in code files and display panel files are specifically derived from management definition objects, such as from an MOF (Management Object Format) file, as in the excerpt from Applicants' specification reproduced below:

Management definition object 220, such as a MOF, is read and evaluated (step 215) to determine the panels, plug-in code, and NLS data needed to process. [Applicants' specification, p. 13, lines 11-14].

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As the Summary section of the present application explicitly points out, the present invention is specifically directed to a plug-in *builder* process. Hence, the origins of the plug-in code files and display panels, as recited in the claims, are important features of the invention and cannot properly be ignored. Indeed, the very first sentence of Applicants' Summary reads:

It has been discovered that a plug-in builder process can be performed using a management definition object, such as a CIM MOF file, to allow objects included in the management definition object to be accessible through a variety of management consoles. [Applicants' specification, p. 5, lines 3-6].

Hence, while the presently rejected claims recite "plug-in code files derived from the management data" and "display panel files derived from the management data," the cited AGNIHOTRI reference fails to teach or suggest these features. Therefore AGNIHOTRI fails to teach all elements of the claimed invention and, consequently, fails to anticipate the invention as recited in claims 1, 8, 15, and 25.

In addition, with respect to independent claim 25, AGNIHOTRI fails to teach or suggest the claimed feature of "retrieving one or more translation files derived from the management data, each of the translation files *corresponding to at least one national language*" (emphasis added). Although the Examiner cites an excerpt from AGNIHOTRI that makes a passing reference to "language," the excerpt makes no mention of retrieving any translation files corresponding to any national language. In fact, from the context, it appears that by "language," AGNIHOTRI is referring to a computer programming language, such as C or Pascal, rather than a "national" or "natural" language used for human communication.

The Install Interface DLL 214 may store generic instruction sets (i.e., interface programs) for supporting the installation process, including providing console information such as installation directory, language, console version, etc. Individual instructions sets (in bold print) and textual comments may be written in any of the C-family (e.g., C or C++) code language. However, other program languages included in the non-exhaustive list of Basic and Pascal may also be used. [col. 5, lines 43-51].

Thus, for this additional reason, AGNIHOTRI fails to anticipate independent claim 25.

For the foregoing reasons, Applicants respectfully submit that AGNIHOTRI does not teach or suggest all of the limitations of the present invention as recited in independent claims 1,

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8, 15, and 25. Applicants maintain that these claims are patentable over AGNIHOTRI and are in condition for allowance.

Claims 3-7, 10-14, and 17-21 are dependent claims that depend from independent claims 1, 8, and 15. Applicants have already demonstrated claims 1, 8, and 15 to be in condition for allowance. Applicants respectfully submit that claims 3-7, 10-14, and 17-21 are also allowable, at least by virtue of their dependency on allowable claims.

Accordingly, Applicants respectfully request that claims 1, 3-8, 10-15, 17-21, and 25 be allowed.

### II. 35 U.S.C. § 103, Obviousness

The Examiner rejected claims 2, 9, 16, and 22-24 under 35 U.S.C. § 103 as being obvious in view of US 6,311,321 (AGNIHOTRI et al.) 2001-10-30 and "Common Information Model (CIM) Specification v. 2.2" (CIM). This rejection is respectfully traversed.

The Office bears the burden of establishing a *prima facie* case of obviousness based on the prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). For an invention to be *prima facie* obvious, the prior art must teach or suggest all claim limitations. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970).

#### A. Claims 22-23

With regard to independent claims 22-23, the references fail to teach or suggest all elements of these claims. These independent claims, like independent claim 25, also recite "retrieving one or more translation files derived from the management data, each of the translation files corresponding to at least one national language." As with independent claim 25, the Examiner relies on col. 5, lines 43-46 of AGNIHOTRI to support the proposition that the prior art teaches or suggests this feature. Applicants have shown, in the preceding section of this Response, that AGNIHOTRI fails to teach or suggest this feature, however. Moreover, Applicants respectfully submit that the CIM reference also fails to teach or suggest this feature.

In addition, claims 22 and 23 also recite the features of retrieving one or more plug-in code files derived from the management data and retrieving one or more display panel files derived from the management data. For the reasons outlined with respect to claims 1, 8, 15, and

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25 in the previous section of this Response, AGNIHOTRI fails to teach or suggest these features. Applicants respectfully submit that the CIM reference also fails to teach or suggest these features.

Therefore, the Office's burden of establishing a *prima facie* case of obviousness with respect to claims 22-23 as not been met.

B. Claim 24

Claim 24 recites a feature of "code generation logic for generating a console plug-in code file for each of the console identifiers." This feature is neither taught nor suggested by the cited references. As stated in the previous section of this Response, to the extent that one can analogize the "applet components" of AGNIHOTRI to the "plug-in code files" recited in the presently rejected claims (as the Examiner has attempted to do), AGNIHOTRI fails to teach or suggest anything regarding the origins of those "applet components." Thus, AGNIHOTRI certainly fails to teach or suggest a feature of *generating* a console plug-in code file, as recited in claim 24.

In addition, claim 24 also recites the features of retrieving one or more plug-in code files derived from the management data and retrieving one or more display panel files derived from the management data. For the reasons outlined with respect to claims 22 and 23 above, neither AGNIHOTRI nor CIM teaches or suggests these features.

Therefore, the Office's burden of establishing a *prima facie* case of obviousness with respect to claim 24 has not been met.

C. Claims 2, 9, and 16

Claims 2, 9, and 16 are dependent claims that depend on independent claims 1, 8, and 15. Applicants have already demonstrated claims 1, 8, and 15 to be in condition for allowance. Applicants respectfully submit that claims 2, 9, and 16 are also allowable, at least by virtue of their dependency on allowable claims.

For the foregoing reasons, Applicants submit that claims 2, 9, 16, and 22-24 are patentable over the references. Accordingly, Applicants respectfully request that claims 2, 9, 16, and 22-24 be allowed.

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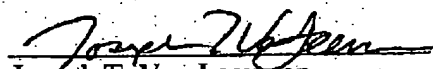
**III. Conclusion**

As a result of the foregoing, it is asserted by Applicants that the remaining claims in the Application are in condition for allowance, and Applicants respectfully request allowance of such claims.

Applicants respectfully request that the Examiner contact the Applicants' attorney listed below if the Examiner believes that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

Respectfully submitted,

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